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December 20, 1996

Anne A. Weissenborn, Esquire  
Office of the General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

RE: MURs 4317 and 4323-- The Honorable Mike Huckabee,  
the Huckabee U.S. Senate Election Committee, and  
Prissy Hickerson as Treasurer, and  
the Huckabee Election Committee, and  
Prissy Hickerson, as Treasurer

DEC 23 4 31 PM '96

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF THE  
GENERAL COUNSEL

Dear Ms. Weissenborn:

In response to the Federal Election Commission's ("Commission") recent findings of reason to believe that violations of the Federal Election Campaign Act ("Act") occurred in MURs 4317 and 4323, the above-captioned Respondents submit the following statement and responses to Interrogatories and Request for Production of Documents.<sup>1</sup>

Respondents do not believe that the Commission's findings are justified in light of the facts presented in these matters, especially since many of the activities occurred in non-federal elections governed by state law. Accordingly, for the reasons set forth below, Respondents respectfully request that, after reviewing these materials, the Commission reassess its position and vote to take no further action on these matters. Nonetheless, since relatively minor sums of money are at issue and since Mike Huckabee is now Governor of Arkansas and no longer a candidate for the United States Senate, Respondents have also included a request to pursue pre-probable cause conciliation in connection with these matters.

<sup>1</sup> The responses to the Commission's Interrogatories and Request For Production of Documents were signed and verified by Ms. Brenda Turner on December 20, 1996. Due to time constraints, a copy of this verification page is attached to the responses. The original verification will be sent to the Commission shortly.

Ms. Anne A. Weissenborn, Esq.

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**MUR 4317**

In MUR 4317, the Commission found reason to believe that the Huckabee U.S. Senate Election Committee ("Senate Committee"), and Prissy Hickerson, as Treasurer, violated: (1) 2 U.S.C. § 434(b)(3)(A) by mistakenly identifying a \$500 contributor as Roger Meek, a representative from the Coca-Cola Bottling Company partnership, rather than the partnership itself; (2) 2 U.S.C. § 434(b)(3)(A) by mistakenly identifying another \$500 contributor as Richard Cisne of the partnership Hudson, Cisne, Keeling-Culp and Company, rather than the partnership itself; and (3) 2 U.S.C. § 441b by mistakenly accepting a contribution from the Delta Beverage Group, Inc. that was later refunded upon discovery of the mistake.

Respondents believe these findings are unjustified since each apparent violation stems from a good-faith, unintentional mistake that was made in the spirit of full compliance.

Roger Meek was listed as the contributor rather than his partnership as the result of a simple miscommunication. Since Fort Smith Coca Cola Bottling Co. has a political action committee that had contributed to Mr. Huckabee's state elections in the past, Senate Committee personnel initially assumed that the Fort Smith Coca Cola Bottling Co. check signed by Mr. Meek was a contribution from such PAC. It was then reported accordingly. When questions arose concerning this contribution, the Senate Committee researched the matter and was apparently instructed that the check was intended as a personal contribution from Mr. Meek.<sup>2</sup> Based on this information, the Committee filed an amendment to its 1995 Year End Report listing Mr. Meek as the donor. This information was apparently incorrect given the Commission's statement that Mr. Meek actually intended the contribution to be from the entire partnership. While not done correctly, this is a case of simple error, and nothing more.

Mr. Cisne's incorrect listing resulted from similar circumstances. Since Mr. Cisne signed the check and had contributed to Mr. Huckabee's state campaigns in the past, Senate Committee personnel reported this contribution as an individual contribution rather than a partnership contribution. Mr. Cisne's name was inadvertently omitted from the report due to a computer software glitch. When questions arose concerning this contribution, the Senate Committee researched the matter and was apparently instructed that the check was intended as a personal contribution from Mr. Cisne.<sup>3</sup> The Committee then amended its reports to confirm Mr. Cisne as

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<sup>2</sup> Respondents are currently searching for any documents that may confirm this instruction. Should any such documents be found, they will be produced to the Commission promptly.

<sup>3</sup> Respondents are currently searching for any documents that may confirm this instruction. Should any such documents be found, they will be produced to the Commission promptly.

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the contributor. However, the instruction received by the Committee may have been incorrect since the Commission states on page 4 of its Factual and Legal Analysis that this contribution was "apparently" from the partnership at large. Again, this error was the result of simple miscommunication and there was never any intention on the part of the Senate Committee to conceal this contribution or otherwise fail to disclose information to the Commission.

The Delta Beverage contribution error resulted from an unintentional mistake during the hectic first days of the Senate Committee's exploratory phase when it received a number of contributions from soft drink company political action committees. Committee personnel mistakenly believed that Delta Beverage was one such political action committee and reported the contribution as being from a PAC.<sup>4</sup> There was also considerable confusion as to whether this check was intended for the Senate Committee or for debt retirement from the 1994 Lt. Governor's race. When it came to the Committee's attention months later that Delta Beverage check was not from its political action committee, but rather the corporation, the contribution was refunded promptly and voluntarily in the spirit of full compliance with the Act.

While the Commission has singled out these three contributions, it is important to remember these are only three contributions totaling only \$2,000 involving inadvertent errors. Respondents request that the Commission take no further action on MUR 4317.

#### MUR 4323

In MUR 4323, the Commission found reason to believe that Respondents violated 2 U.S.C. § 441b by using state campaign funds to support Senate campaign activities, and 2 U.S.C. § 434(b)(3)(A) by failing to use "best efforts" to identify persons who made over \$200 in contributions.

Respondents believe that these findings are unjustified and inappropriate given that: (1) both the two-page mailing and Washington, D.C. trip questioned by the Commission were solely non-federal activities conducted pursuant to Arkansas law, and (2) "best efforts" were in fact made to obtain all relevant donor information.

With respect to the two-page debt retirement letter and survey issued by the State Committee in May of 1995 (attached as Document No. 9), Respondents reiterate that this mailing

<sup>4</sup>

Delta Beverage Group, Inc. does in fact have a political action committee.

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was for the purely non-federal purposes of retiring debt from the 1994 Lieutenant Governor's campaign and surveying constituents' opinions on a wide range of important state issues. As the Commission will see upon review of this mailing, neither the letter nor the survey ever advocates the election or defeat of Lieutenant Governor Huckabee as a Senate candidate, or solicits money for his Senate campaign in any way. Rather, the purpose of the mailing was to generate interest so potential donors would contribute to the Lt. Governor's debt-retirement efforts. The one question at issue out of a two-page, ten-question survey was important to Arkansas voters at the time it was asked. Moreover, the one brief question regarding the open U.S. Senate seat was a legitimate state issue receiving tremendous media attention at the time. Its inclusion in the general survey in no way transformed a strictly non-federal debt retirement mailing into a "testing the waters" activity. Likewise, the fact that the survey posed some questions regarding issues that happened to have federal as well as state implications does not alter the fundamental non-federal nature or legitimacy of this mailing. Thus, Respondents maintain that the costs of this mailing were appropriately paid out of the state account.

In addition, as the attached Responses to Interrogatories and Requests for Production of Documents show, the Commission's calculation of the cost of this mailing is significantly inflated. As Respondents' answer to Interrogatory No. 1 and the invoice attached as Document No. 1 show, the only cost associated with this mailing was a \$2,824.83 payment to Griffith Enterprises -- not \$13,101.35 as suggested by the Commission. Moreover, the questions raised by the Commission as to the potentially excessive fundraising activities of the State Committee were thoroughly investigated by the Arkansas Ethics Commission. Accordingly, it is not clear why and under what scope of authority the Commission is now looking at this matter.

With respect to the Washington, D.C. trip made by then Lieutenant Governor Huckabee and his state campaign director, Brenda Turner, on August 1-3, 1995, Respondents reiterate that this trip was for the sole purpose of meeting with political consultant Richard Morris to discuss an outstanding debt for services provided during the 1994 Lt. Governor's race. This trip was simply not for the purpose of "testing the waters" for a possible Senate campaign. In fact, Lt. Governor Huckabee and Ms. Turner never even intended to go to Washington since the initial plan was to meet with Mr. Morris in Arkansas. Washington, D.C. was chosen as a convenient alternative site only after certain political realities made it difficult for Mr. Morris to travel to Arkansas, thereby precluding any possibility of a pre-meditated "testing the waters" outing.

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There was no intention that this trip be a Senate campaign "testing the waters" trip and Lt. Governor Huckabee never engaged in any activities while in Washington that would meet the definition of such a purpose. The fact that Mr. Huckabee was asked informally, and not on his own volition, about the open U.S. Senate seat in Arkansas does not automatically transform this trip into a "testing the waters" effort as suggested by the Commission. Moreover, Respondents are puzzled by the Commission's blind reliance on unsubstantiated newspaper stories suggesting that this trip was related to a federal campaign. No foundation or evidence has been presented to verify the accuracy of such newspaper stories. Indeed, newspapers often misquote public figures or report their statements out of context, and the articles cited by the Commission are perfect examples.

Given that the Washington, D.C. trip was for solely non-federal purposes, Respondents believe the Commission's finding of reason to believe is unjustified. Informal conversations and questionable newspaper articles do not provide the necessary support to overcome the clear facts in this matter.

Lastly, Respondents take issue with the Commission's finding of reason to believe that the Senate Committee did not meet the "best efforts" requirements. As a matter of policy and practice, the Senate Committee asked donors to provide the required information (e.g., name, address, occupation, employer) when making a contribution. When the requested information was not provided, the Senate Committee would send the contributor in question a follow-up letter requesting the omitted information. Contrary to the Commission's statement on page 24 of its Factual and Legal Analysis that the Senate Committee has failed to provide such "follow-up communications", the Senate Committee previously produced these documents as an attachment to its April 22, 1996 response to the complaint in MUR 4323. They are again attached to this response as Document No. 10. Respondents believe that these letters serve as clear evidence of compliance with the "best efforts" requirements of the Act. Accordingly, the Commission's reason to believe finding with respect to "best efforts" is unjustified.

### Conclusion

For the reasons set forth above, Respondents respectfully request that the Commission either find no probable cause or take no further action on MURs 4317 and 4323. Nonetheless, given the relatively minor amounts at issue in these matters (\$2,000 in MUR 4317 and approximately \$4,000-5,000 in MUR 4323), and the fact that Mike Huckabee is now Governor

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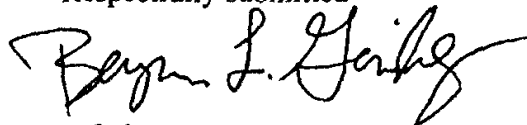
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of Arkansas and no longer a candidate for United States Senate, Respondents hereby formally express their desire to pursue pre-probable cause conciliation with respect to these matters.

Respectfully submitted



Benjamin L. Ginsberg

Robert P. Ritger

Counsel for Respondents

BLG/jeb  
#227096

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )

Huckabee U.S. Senate Election Committee and )

Prissy Hickerson, as treasurer )

Huckabee Election Committee and )

Prissy Hickerson, as treasurer )

The Honorable Mike Huckabee )

MUR 4323

**RESPONSES TO THE FEDERAL ELECTION COMMISSION'S  
INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS**

The Honorable Mike Huckabee, the Huckabee U.S. Senate Election Committee ("Senate Committee"), the Huckabee Election Committee ("State Committee") and Prissy Hickerson, as Treasurer, by their undersigned counsel, hereby submit the following objections and responses to the Federal Election Commission's ("Commission") Interrogatories and Request For Production of Documents:

**GENERAL OBJECTIONS**

The following general objections apply to each interrogatory and request for production of documents ("the "Discovery Requests"):

1. The Honorable Mike Huckabee, the Senate Committee, the State Committee and Prissy Hickerson (collectively referred to as the "Respondents") object to the Discovery Requests to the extent that they call for the disclosure of information and/or production of documents that are protected from discovery by the attorney-client privilege or work-product immunity or are

otherwise privileged. To the extent that any privileged document is or may be produced in response to the Discovery Requests, the production of any such document is inadvertent and is not to be deemed a waiver of any privilege with respect to the produced document or any other document.

2. Respondents object to the Discovery Requests to the extent they purport to impose obligations to supplement the disclosure of information and/or the production of documents beyond those imposed by the United States Code.

3. Respondents undertake to disclose information and produce documents in response to the Discovery Requests only in the form, and to the extent, required by 2 U.S.C. § 437d and any other applicable provisions of the United States Code. The Committees object to each instruction, definition, question and request contained in the Discovery Requests to the extent that each instruction, definition, question and request attempts to impose obligations concerning the form or context of document production beyond those required by such provisions or exceeds the scope of investigation permitted by, or conflicts with, 2 U.S.C. § 437d and any other applicable provisions of the United States Code.

4. The Respondents object to the Discovery Requests to the extent that they call for documents containing proprietary information.

5. The Respondents reserve the right to modify the objections made herein or to assert additional objections to production as appropriate.

6. The Respondents reserve the right to modify, amend or supplement the answers to the questions contained herein as further information becomes available or as otherwise appropriate.



## SPECIFIC OBJECTIONS AND ANSWERS TO QUESTIONS

### Question No. 1

The Report issued by the Arkansas Ethics Commission following its review of State Committee records found that the State Committee had raised \$91,825.00 in contributions after the 1994 general election. Reports submitted by the State Committee to the Arkansas Ethics Commission show a total of \$115,646.25 in receipts between May 1 and August 31, 1995. Please explain the discrepancy between these two figures.

### Objection to Question No. 1

Respondents object to this Question on the grounds that the information sought relates solely to non-federal activities conducted pursuant to Arkansas law. As such, the activities are beyond the jurisdiction of the Commission. Subject to this objection and without waiving it, Respondents answer as follows.

### Answer:

The discrepancy between these two figures stems largely from a simple reporting error made by the State Committee's Pulaski County Office. The Pulaski County Office raised approximately \$22,590.37 in contributions during 1994, yet these contributions were mistakenly omitted from the State Committee's 1994 Report of Contributions and Expenditures filed with the Arkansas Ethics Commission. When this reporting error was subsequently discovered in 1995, the State Committee attempted to take corrective action by including the omitted 1994 contributions in its May 1995 report, causing this report to show an inflated total of \$115,646.25 in receipts for the reporting period. Later, realizing that the omitted contributions should have been reported as an amendment to the 1994 report as opposed to in the 1995 report, the State Committee amended its 1994 report to include the relevant contributions and amended its 1995

report to subtract such contributions. This series of events was disclosed fully to the Arkansas Ethics Commission, thereby explaining the lower figure found in their records. The Arkansas Ethics Commission verified the State Committee's explanation and chose not to penalize the Committee for its mistakes.

**Question No. 2**

**With regard to the "two-page debt retirement letter" issued by the State Committee in May, 1995, which is cited by Brenda Turner in her affidavit filed in this matter,**

- a. please itemize by payee all expenditures made by the State Committee in connection with this fundraising letter and the enclosed survey, including Committee personnel costs allocable to this activity, and**
- b. please identify all persons involved in the preparation and approval of this fundraising letter and survey.**

**Objection to Question No. 2**

Respondents object to this Question on the grounds that the information sought relates solely to non-federal activities conducted pursuant to Arkansas law. As such, the activities are beyond the jurisdiction of the Commission. Subject to this objection and without waiving it, Respondents answer as follows.

**Answer:**

(a) The State Committee made a \$2,824.83 disbursement to Griffith Enterprises to handle all aspects of the 6,100 piece May, 1995 mailing, including postage, materials and labor. See Griffith Enterprises Invoice, attached as Document No. 1. No other expenditures were made with respect to this mailing. No State Committee personnel were involved with any aspect of the mailing other than Brenda Turner, who assisted Lieutenant Governor Huckabee in the drafting of the letter and survey.

(b) Mike Huckabee and Brenda Turner jointly drafted the fundraising letter and survey.

**Question 3**

**Please state whether the State Committee issued any other fundraising letters and/or surveys between May 1, 1995 and June 30, 1996.**

- a. If yes, please itemize all expenditures made by the State Committee in connection with such fundraising letters, including Committee personnel costs allocable to this activity.
- b. Please identify all persons involved in the preparation and approval of these fundraising activities.

**Objection to Question No. 3**

Respondents object to this Question on the grounds that it is overly broad and the information sought relates solely to non-federal activities conducted pursuant to Arkansas law. As such, the activities are beyond the jurisdiction of the Commission. Subject to this objection and without waiving it, Respondents answer as follows.

**Answer:**

No other fundraising letters and/or surveys were issued by the State Committee during that period.

**Question No. 4**

**Please specify by date, purpose and quantity any and all mailings involved in the following expenditures listed in the State Committee's Reports of Contributions and Expenditures filed in 1995.**

May, 1995	US Postal Service	\$137.95
May, 1995	Griffith Enterprises	\$1,500.00
June, 1995	Griffith Enterprises	\$4,681.58
June, 1995	US Post Office	\$448
June, 1995	Sutton Press	\$318.51
July, 1995	Griffith Enterprises	\$2,893.93
July, 1995	Griffith Enterprises	\$2,546.00
July, 1995	US Postal Service	\$320.00
July, 1995	Sutton Press	\$255.38

#### **Objection to Question No. 4**

Respondents object to this Question on the grounds that it is overly broad and the information sought relates solely to non-federal activities conducted pursuant to Arkansas law. As such, the activities are beyond the jurisdiction of the Commission. Subject to this objection and without waiving it, Respondents answer as follows.

#### **Answer:**

The payments to the U.S. Postal Service in May and June of 1995, Griffith Enterprises in May and June of 1995, and Sutton Press in June of 1995 were for debts remaining from the State Committee's activities in 1994 which are beyond the scope of MUR 4323. Of the July 1995 payment of \$2,893.93 to Griffith Enterprises: (a) \$2,824.83 was for the two-page debt retirement letter and survey issued by the State Committee in May of 1995, of which approximately 6,100 were mailed throughout Arkansas; and (b) \$69.10 was for miscellaneous other expenses. The July 1995 payment of \$2,546.00 to Griffith Enterprises was for "thank you" letters to constituents that had responded to the May 1995 debt retirement mailing and for other miscellaneous mailings not related to fundraising. The remaining July 1995 payments to the U.S. Postal Service and Sutton Press were for routine office expenses, not mass mailings.

#### **Question No. 5**

**Please itemize all expenditures made by the State Committee in connection with the trip to Washington, D.C. made by the Honorable Mike Huckabee and Ms. Brenda Turner on August 1-3, 1995.**

#### **Objection to Question No. 5**

Respondents object to this Question on the grounds that the information sought relates solely to non-federal activities conducted pursuant to Arkansas law. As such, the activities are

beyond the jurisdiction of the Commission. Subject to this objection and without waiving it, Respondents answer as follows.

**Answer:**

The State Committee made the following expenditures in connection with the Washington, D.C. trip on August 1-3, 1995:

- a \$857.00 payment to Goodwin Travel on July 31, 1995 for Brenda Turner's airplane ticket (See Goodwin Travel Invoice and Huckabee Re-Election Committee Check, attached as Document No. 2);
- a \$954.00 payment to Citibank on July 31, 1995 for Lieutenant Governor Huckabee's ticket (See Huckabee Re-Election Committee Check and Citibank Invoice, attached as Document No. 3); and
- \$350 in petty cash was taken out from CNB before the trip, a portion of which was used for miscellaneous travel expenses (*e.g.*, cabs, telephone calls, *etc.*).

Despite exercising due diligence in searching records in both Little Rock and Texarkana, Respondents have been unable to locate specific records and receipts detailing expenditures made during this trip for lodging at the Capitol Suites Hotel. However, Respondents are continuing to search for these records and will supplement their answer to this question should further information become available. Other than a minor amount of petty cash, there were virtually no expenditures made for meals during this trip given that Mr. Morris paid for most of the meals and food was otherwise readily available at several of the organizations where courtesy visits were made.

**Question No. 6**

**Please itemize, identify the travelers involved, and give the purpose for the travel-related charges covered by the following expenditures listed in the State Committee's Reports of Contributions and Expenditures filed in 1995.**

May, 1995	VISA	\$4,146.13
May, 1995	Mastercard	\$1,443.00
June, 1995	Mastercard	\$441.00
June, 1995	Brenda Turner	\$1,135.86
June, 1995	Bill Cope	\$593.75
July, 1995	Brenda Turner	\$361.46
July, 1995	Mastercard	\$3,394.50
July, 1995	CNB	\$350.00
September, 1995	Discover	\$623.00

**Objection to Question No. 6**

Respondents object to this Question on the grounds that it is overly broad and the information sought relates solely to non-federal activities conducted pursuant to Arkansas law. As such, the activities are beyond the jurisdiction of the Commission. Subject to this objection and without waiving it, Respondents answer as follows.

**Answer:**

The expenditures listed were for the following purposes:

- The May, 1995 VISA payment was for holdover travel expenses incurred by Lieutenant Governor Huckabee and campaign staff in 1994 during the course of his state re-election campaign;
- The May, 1995 Mastercard payment was for travel expenses incurred by Lieutenant Governor Huckabee in 1995 for various trips to stay in touch with constituents and attend various Arkansas Republican Party events, none of which were fundraisers or federal

campaign-related events (*See* Travel Expense Reimbursement Form, attached as Document No. 4);

- The June, 1995 Mastercard payment was for travel expenses incurred by Lieutenant Governor Huckabee in 1995 for various trips within Arkansas to stay in touch with constituents and attend various Arkansas Republican Party events, none of which were fundraisers or federal campaign-related events;
- The June, 1995 payment to Brenda Turner was reimbursement for travel expenses she incurred in Lieutenant Governor Huckabee's 1994 state re-election campaign;
- The June, 1995 payment to Bill Cope was for air transportation services provided to Lieutenant Governor Huckabee during a 1995 trip to Paragould, Arkansas for a speaking engagement at a dinner held by the Republican Party of Arkansas. This was not a fundraising or federal campaign-related event. (*See* Cope's Pilot Service Invoice, attached as Document No. 5);
- The July, 1995 payment to Brenda Turner was reimbursement for expenses she incurred for various trips between Texarkana and Little Rock (*e.g.*, mileage, meals, lodging) during the planning stages of a fundraiser to retire debt from Lieutenant Governor Huckabee's 1994 re-election campaign;
- The July, 1995 Mastercard payment was for travel expenses incurred by Lieutenant Governor Huckabee in 1995 for various trips within Arkansas to stay in touch with constituents and attend various Arkansas Republican Party events, none of which were fundraisers or federal campaign-related events;

- The July, 1995 payment to CNB was for petty cash taken out in preparation for the Washington, D.C. trip by Lieutenant Governor Huckabee and Brenda Turner on August 1-3, 1995; and
- The September, 1995 Discover payment was for travel expenses incurred by Lieutenant Governor Huckabee in 1995 for various trips within Arkansas to stay in touch with constituents and attend various Arkansas Republican Party events, none of which were fundraisers or federal campaign-related events. (See Travel Expense Reimbursement Form. attached as Document No. 6).

**Question No. 7**

**Please itemize and/or give the purpose for the following expenditures listed in the State Committee's Reports of Contributions and Expenditures filed in 1995.**

June, 1995	Discover	\$2,017.82
June, 1995	Fuller Enterprises	\$200.00
July, 1995	Little Rock Club	\$707.55
July, 1995	Repub. Party of Ark.	\$1,000.00

**Objection to Question No. 7**

Respondents object to this Question on the grounds that it is overly broad and the information sought relates solely to non-federal activities conducted pursuant to Arkansas law. As such, the activities are beyond the jurisdiction of the Commission. Subject to this objection and without waiving it, Respondents answer as follows.

**Answer**

The expenditures listed were for the following purposes:

- The June, 1995 Discover payment was to reimburse Lieutenant Governor Huckabee for expenses he incurred in connection with an election night victory party held on November



8, 1994 at the Little Rock Hilton Inn (See Little Rock Hilton Invoice, attached as Document No. 7);

- The June, 1995 payment to Fuller Enterprises was for consulting fees incurred in preparation for a fundraiser held in July, 1995, which was attended by representatives from various state political action committees;
- The July, 1995 payment to the Little Rock Club was for the purchase of food and beverages for the state political action committee fundraiser held in July, 1995; and
- The July, 1995 payment to the Republican Party of Arkansas was a contribution delivered during a July, 1995 reception in Little Rock.

#### **Question No. 8**

**Please describe in detail any and all fund-raising projects and/or special events involved in the following expenditures for telephone services:**

May, 1995	GTE	\$976.63
May, 1995	AT&T	\$790.03
June, 1995	GTE	\$1,303.23
June, 1995	Brenda Turner	\$399.00
June, 1995	AT&T	\$844.59
July, 1995	GTE	\$2,052.24

#### **Objection to Question No. 8**

Respondents object to this Question on the grounds that it is overly broad and the information sought relates solely to non-federal activities conducted pursuant to Arkansas law. As such, the activities are beyond the jurisdiction of the Commission. Subject to this objection and without waiving it, Respondents answer as follows.

**Answer:**

All of the telephone expenditures listed stemmed from fundraising activities conducted by the State Committee in order to retire its debt from Lieutenant Governor Huckabee's 1994 re-election campaign. Specifically:

- The May, 1995 payment to GTE was for fundraising phone calls made from January, 1995 through April, 1995;
- The May, 1995 payment to AT&T was for fundraising phone calls made from January, 1995 through April, 1995;
- The June, 1995 payment to GTE was for fundraising phone calls made by Brenda Turner, Prissy Hickerson, Lieutenant Governor Huckabee and Janet Huckabee on their personal phones in May, 1995;
- The June, 1995 payment to Brenda Turner was reimbursement for telephone expenses she incurred in connection with her fundraising activities from January, 1995 through May, 1995;
- The June, 1995 payment to AT&T was for fundraising phone calls from January, 1995 through May, 1995; and
- The July, 1995 payment to GTE was for fundraising phone calls from January, 1995 through May, 1995.

## **SPECIFIC OBJECTIONS AND RESPONSES TO REQUESTS FOR DOCUMENTS**

### **Request No. 1**

**Please provide copies of all reports filed by the State Committee with the Arkansas Ethics Commission between October 1, 1995 and June 30, 1996.**

### **Objection and Response to Request No. 1**

Respondents object to this Request on the grounds that the information sought is readily available to the public from the Arkansas Ethic Commission and relates solely to non-federal activities conducted pursuant to Arkansas law. As such, the activities are beyond the jurisdiction of the Commission.

Subject to this objection, and without waiving it, the Committees have produced the only report filed by the State Committee during the relevant period before terminating operations. attached as Document No. 8.

### **Request No. 2**

**Please provide all solicitation letters and surveys produced and distributed by and for the State Committee between May 1, 1995 and June 30, 1996.**

### **Objection and Response to Request No. 2**

Respondents object to this Question on the grounds that the information sought relates solely to non-federal activities conducted pursuant to Arkansas law. As such, the activities are beyond the jurisdiction of the Commission.

Subject to this objection, and without waiving it, Respondents have produced the two-page debt retirement letter and survey issued in May, 1995, attached as Document No. 9.

This was the only fundraising mailing sent by the State Committee between May, 1995 and June 30, 1996.

**Request No. 3**

**Please provide all documents related to the production and distribution of each solicitation letter and survey cited in Request for Documents #2 above.**

**Objection and Response to Request No. 3**

Respondents object to this Question on the grounds that the information sought relates solely to non-federal activities conducted pursuant to Arkansas law. As such, the activities are beyond the jurisdiction of the Commission.

Subject to this objection, and without waiving it, Respondents have produced an invoice from Griffith Enterprises for activities relating to this mailing, attached as Document No.1. This invoice is for the only disbursement relating to the May, 1995 mailing.

**Request No. 4**

**Please provide all documents related to the expenditures for the trip to Washington, DC cited in Question # 5 above.**

**Objection and Response to Request No. 4**

Respondents object to this Question on the grounds that the information sought relates solely to non-federal activities conducted pursuant to Arkansas law. As such, the activities are beyond the jurisdiction of the Commission.

Subject to this objection, and without waiving it, Respondents have exercised due diligence in attempting to produce all of the requested documents. However, the only

responsive documents that Respondents have found thus far are attached as Documents No. 2-3. Respondents are continuing to search their records for additional documents and will supplement this response if and when further information becomes available.

**Response to Request No. 5**

**Please provide all documents related to the expenditures for travel listed in Question # 6 above.**

**Objection and Response to Request No. 5**

Respondents object to this Question on the grounds that it is overly broad and the information sought relates solely to non-federal activities conducted pursuant to Arkansas law. As such, the activities are beyond the jurisdiction of the Commission.

Subject to this objection, and without waiving it, Respondents have exercised due diligence in attempting to produce all of the requested documents. However, the only responsive documents that Respondents have found thus far are attached as Documents No. 4-6. Respondents are continuing to search their records for additional documents and will supplement this response if and when further information becomes available.

**Attorney Client Privilege - Confidential**

The above-responses to the Commission's Interrogatories and Request For Production of Documents are true to the best of my knowledge, information and belief.

Brenda Turner  
Brenda Turner

Sworn to and subscribed before me  
on this 22 day of December, 1996.

Harry Cogbill  
Notary Public

My Commission Expires: 8-1-99

99.04.391.4227

## **DOCUMENT NO. 1**



# Griffith ENTERPRISES

1006 Westlawn Drive  
Texarkana, Texas 75501-4069  
(903) 832-6991 • FAX: (903) 832-7662

SOLD TO:

HEC  
Brenda Turner  
PO Box 1557  
Texarkana, AR 75504

SHIP TO:

HEC  
Brenda Turner  
PO Box 1557  
Texarkana, AR 75504

## INVOICE

NO. 4820

DATE 5/9/95

PAGE 1 of 1

ITEM	QUANTITY	UNIT	DESCRIPTION	S	UNIT PRICE	AMOUNT
MS3	1,367	Each	Mail Serv	*	0.03	41.01
MSBC	4,450	Each	Mail Serv (Bar Coded)	*	0.04	178.00
			Postage			953.31
	6,100	Each	Survey	*	0.0665	405.42
			Design	*		75.00
	6,100	Each	Letter	*	0.0709	432.72
			Design	*		25.00
	6,100	Each	#9 Return Env	*	0.048	292.92
	6,100	Each	#10 Outside Env	*	0.0457	278.82
			Sales Tax			142.63
Pack # 1825						
COMMENTS: We appreciate your business!					TOTAL ►	2,824.83



**DOCUMENT NO. 2**

HUCKABEE RE-ELECTION COMMITTEE

P.O. BOX 1557  
TEXARKANA, TEXAS 75504-1557

1919

000001 8582 080  
0807 20737002 19  
7-31 95

PAY  
TO THE  
ORDER OF

*Citibank*

\$ 857.00

*Eight Hundred Fifty-seven and no/100*

DOLLARS



COMMERCIAL NATIONAL BANK  
TEXARKANA, ARKANSAS

FOR 4128 0031 9454 1838

*Brenda Turner*

⑈001919⑈ ⑆082901046⑆ 66 897 4⑈

*Janet Huckabee*

# James F. Goodwin

TRAVEL, INC.

320 WEST CAPITOL SUITE 244  
LITTLE ROCK AR 72201  
501 375-6427

800 365-4111 TOLL FREE  
TURNER/BRENDA

BRENDA TURNER  
3910 CONCORD PLACE  
TEXARKANA TX 75501

\*\*\*TO INSURE PROPER CREDIT...PLEASE\*\*\*  
RETURN YELLOW COPY WITH PAYMENT.

JUL 11 1995 INVOICE:950711623 AGENT:WH4JS REFER TO:4T28RK PAGE:01

01 AUG 95 - TUESDAY

DELTA 1246 COACH CLASS

LV: LITTLE ROCK 705A ONE STOP MILES- 888 CONFIRMED

AR: WASH/NATIONAL 1140A

SEAT-170

03 AUG 95 - THURSDAY

DELTA 931 COACH CLASS

LV: WASH/NATIONAL 450P NONSTOP MILES- 411 CONFIRMED

AR: CINCINNATI 625P

SEAT-390

DELTA 1539 COACH CLASS

LV: CINCINNATI 658P NONSTOP MILES- 514 CONFIRMED

AR: LITTLE ROCK 735P

SEAT-130

800-365-4111 ASSISTANCE 8:30-4:30 M-F  
AFTER HOURS 800-628-6668 V.I.T. CODE: AWH4

TICKET NUMBER/S:

TURNER/BRENDA

1417875429

*Pa*  
*ck# 1896*

AIR TRANSPORTATION	770.90	TAX	86.10	TTL	857.00
		SUB TOTAL			857.00
		CREDIT CARD PAYMENT			857.00-
		AMOUNT DUE			0.00
		\$200 THOUSAND DOLLARS ACCIDENT			
		INSURANCE INCLUDED WITH EACH TICKET			
		ISSUED BY JAMES F GOODWIN TRAVEL			

99 " 04 " 34 " 42 " 32

## **DOCUMENT NO. 3**

99 "04" 391 "4233

# Citibank AAdvantage<sup>®</sup>

Account Number A registered service mark of American Airlines, Inc.

For Customer Serv. Write

800-950-5114

To report billing errors, write  
to this address, enclosing  
not enclose your rights.

BOX 6000  
THE LAKES, NV  
89163-6000

PAYMENT DUE DATE 08/03/95

Statement/Closing Date	Total Credit Line	Cash Advance Limit	New Balance	Available Credit Line	Available Cash Limit
07/14/95	\$15000	\$1500	\$7457.18	\$7542	\$1500



7/06	7/06	DX4C2RF*	DELTA AIR	0061417875290	LITTLE ROCK	AR Wash	477.00
7/06	7/06	MX4C2RF*	DELTA AIR	0061417875291	LITTLE ROCK	AR Wash	477.00

954.<sup>00</sup>

HUCKABEE RE-ELECTION COMMITTEE

P.O. BOX 1557  
TEXARKANA, TEXAS 75504-1557

1920

000001 8582 082

08/27 2020 9/15/20

PAY  
TO THE  
ORDER OF

*Citibank*

\$ 954.00

*Nine hundred fifty-four and 00/100*

DOLLARS

 COMMERCIAL NATIONAL BANK  
TEXARKANA, ARKANSAS

*Blenda Sumner*

⑈001920⑈ ⑆082901046⑆ 66 897 4⑈

*Janet Huckabee*

**DOCUMENT NO. 4**

# TRAVEL EXPENSE REIMBURSEMENT FORM, TR-1

(SUBMIT IN TRIPLICATE)

23 18  
14 52

DEPARTMENT

*Confession*

OFFICIAL STATION

NAME OF PAYEE

*OK #*

PRIVATE VEHICLE LICENSE NO.

PLACE OF RESIDENCE & ADDRESS

*1802*

DATE

DETAILED EXPENDITURES (OTHER THAN MILEAGE)

TRAVEL BY PRIVATELY OWNED VEHICLE

MO. DAY	NAME OF TOWN VISITED	COMMON CARRIER	HOTEL ROOM	MEALS	PER DIEM	TAXI	INCIDENTALS	TELEPHONE	TOTAL FOR DAY	BETWEEN WHAT POINTS FROM TO	MILEAGE DRIVEN	RATE PER MILE	AMOUNT CLAIMED
23	TXL									TXL	300	.30	90.00
2	Wm Home (21441)			22.00					22.00	Wm Home	320	.30	96.00
2										TXL	300	.30	90.00
2													
3	Washington, D.C.			40.00					40.00				
3	Haystack (Lunch Day)									Haystack	240	.30	72.00
3	Wilmington			20.00					20.00	Wilmington	180	.30	54.00
3	Charlotte			15.00					15.00	Charlotte	200	.30	60.00
3	Thermon, AL (Lunch Day)			20.00					20.00	Thermon	280	.30	84.00
3	TXL									TXL	300	.30	90.00
4	TXL									TXL	300	.30	90.00
4	Wm Home (Rocksville)			30.00					30.00	Wm Home	280	.30	84.00
4	Hot Springs			10.00						Hot Springs	120	.30	36.00
4	TXL									TXL	300	.30	90.00
4	TXL									TXL	300	.30	90.00
SUB-TOTALS									\$	TOTAL FOR MILEAGE			\$1026

INCIDENTALS:

- (1) Postage (2) Parking Fees (3) Registration Fee (4) Emergency Car Repairs  
(5) Guide Service for the Blind (6) Minor Purchases (7) Meals for State Officials  
(8) Other (Explain)

RECAPITULATION

\$

\$

Approved

Travel Supervisor

Signature of Traveler

MILEAGE CLAIMED \$

*✓*



**TRAVEL EXPENSE REIMBURSEMENT FORM, TR-1**  
(SUBMIT IN TRIPLICATE)

(SUBMIT IN TRIPPLICATE)

DEPARTMENT

Page 2

OFFICIAL STATION

NAME OF PAYEE

PRIVATE VEHICLE LICENSE NO.

### PLACE OF RESIDENCE & ADDRESS

[illegible]

TRAVEL BY PRIVATELY OWNED VEHICLE

19														
NAME OF TOWN VISITED		COMMON CARRIER	HOTEL ROOM	MEALS	FEE DIRM.	TAXI	INCIDENT-TALS	TELEPHONE	TOTAL FOR DAY	BETWEEN WHAT POINTS FROM TO		MILEAGE DRIVEN	RATE PER MILE	AMOUNT CLAIMED
57											<del>PRL</del> LR	TRL	300 .35	90 <sup>e</sup>
											LR	TRL	300 .35	90 <sup>e</sup>
											LR	TRL	350 .30	90 <sup>e</sup>

\*INCIDENTALS: (1) Postage (2) Parking Fees (3) Registration Fee (4) Emergency Car Repairs

## RECAPITULATION

(5) Guide Service for the Blind: . . . (6) Minor Purchases . . . (7) Meals for State Guests and Wards of State . . . (8) Other (Explain): . . .

**Approved**

Signature of Traveler

MILEAGE CLAIMED \$ 1443.00

99-04391-4229

## **DOCUMENT NO. 5**

## COPE'S PILOT SERVICES

W.T. (BILL) COPE  
 PRESIDENT  
 123 LOCUST STREET  
 CONWAY, ARKANSAS 72032

Telephone (501) 450-0992  
 Fax (501) 327-3371

Invoice No. 1083

Invoice Date 06/14/95

Bill To:  
 LT. GOVERNOR MIKE HUCKABEE  
 #2 CAMBRIDGE DRIVE  
 TEXARKANA AR 75504

FAX # 501-773-0439

AIRCRAFT	HOBBS OUT	HOBBS IN	DESTINATION	TOTAL
N 448JG	119.5	122.2	LIT,M70, RTN	2.7 HRS

DESCRIPTION	TAXABLE	AMOUNT
TRANSPORTATION PARAGOULD AND RETURN 2.7 @ \$ 175.00 PER HR		472.50
PRE/POST FLIGHT 2.0 @ \$ 15.00 PER HR		30.00
WAITING TIME 5.3 @ \$ 15.00 PER HR		79.50
EXPENSES		6.75
DRINKS/SNACKS		5.00
***CALL 501-450-0992 TO REACH ME 24 HOURS A DAY***		
Pd ck # 1850		

Amount Paid 0.00  
 Statement

0 - 30 days	31 - 60	61 - 90	90 plus	Total Due
593.75	0.00	0.00	0.00	593.75

Subtotal 593.75

**TOTAL \$593.75**

11/24/1966

## DOCUMENT NO. 6

# TRAVEL EXPENSE REIMBURSEMENT FORM, TR-1

(SUBMIT IN TRIPLICATE)

450  
63  
317

*Caplan*

DEPARTMENT

OFFICIAL STATION

PRIVATE VEHICLE LICENSE NO.

NAME OF PAYEE

PLACE OF RESIDENCE & ADDRESS

TRAVEL BY PRIVATELY OWNED VEHICLE

19	MO. DAY	NAME OF TOWN VISITED	COMMON CARRIER	HOTEL ROOM	MEALS	PER DIEM	TAXI	INCIDENTALS	TELEPHONE	TOTAL FOR DAY	BETWEEN WHAT POINTS FROM	TO	MILEAGE DRIVEN	RATE PER MILE	AMOUNT CLAIMED
8	7										LR	TXL	300	.30	90.00
8	14	Michelle (M.K. H. H. H.)			12.00					12.00	LR	Michelle	215	.30	64.50
8	19	Michelle (M.K. H. H. H.)			38.00					38.00	LR	<del>TXL</del>	300	.30	90.00
8	20	Beth H. H.			60.00					60.00	LR	TXL	300	.30	90.00
8	28										LR	TXL	300	.30	90.00
8	31										LR	TXL	300	.30	90.00
SUB-TOTALS											\$110.00	TOTAL FOR MILEAGE			\$513.00

INCIDENTALS:

- (1) Postage
- (2) Parking Fees
- (3) Registration Fee
- (4) Emergency Car Repairs
- (5) Guide Service for the Blind
- (6) Minor Purchases
- (7) Meals for State Guests
- (8) Other (Explain)

RECAPITULATION

SUB-TOTAL \$ 110

MILEAGE CLAIMED \$ 623.00

Approved

Travel Supervisor

Signature of Traveler

**DOCUMENT NO. 7**

Little Rock

925 S. University Ave  
Little Rock, Arkansas 72204Hilton  
INN

File

Name HUCKABEE, MIKE/JANET

In Out Folio  
11/08/94 11/09/94 1 200Address: HUCKABEE ELECTION  
PO BOX 1557  
TEXARKANA, AR 75507  
DL NB99981026 CDLRoom 050  
Rate 120.00  
Room 050  
Rate 120.00TRAVEL  
AGENCY

Date	Description	ID	Ref No	Charges	Credits	Balance
11/08/94		XAQ	17116	2.35		
11/08/94		XAQ	17146	14.64		
11/08/94		XAQ	17172	29.08		
11/08/94		XAQ	17190	5.40		
11/08/94		XAQ	17234	9.29		
11/08/94		XAQ	17662	2.15		
11/08/94		XAQ	21:07	2.67		
11/08/94		XAQ	17098	34.99		
11/08/94		XAQ	21:20	4.31		
11/08/94		XAQ	21:37	2.21		
11/08/94		XAQ	21:45	2.21		
11/08/94		XAQ	21:49	3.95		
11/08/94		XAQ	23:22	2.55		
11/08/94		XAF	380	227.00		
11/08/94		XAF	380	22.70		
11/09/94		CHE	393	39.40		
11/09/94		CHE	258	52.80		
11/09/94		CHE	377	62.83		
11/09/94		CHE	395	69.74		
11/09/94		CDL		1,168.32		
11/09/94		CDL		1.00		
11/09/94		CDL			2,017.62	1.00

Pd  
ck #  
1826

Rates do not include applicable sales occupancy or other taxes

Transfer to credit ledger

I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, company or association fails to pay for any part or the full amount of these charges.

Guest

Firm

Address

City

State

Zip

Guest Signature

**DOCUMENT NO. 8**

44-38861-152-40-63



# Mike HUCKABEE

U.S. Senate



Post Office Box 1557 • Texarkana, Arkansas 75504-1557 • Tel. (501) 772-5344 • Fax (501) 773-0439

«Prefix» «First» «MI» «Last»  
«Address\_Line1»  
«Address\_Line2»  
«City» «State» «Zipcode»

Dear «Prefix» «Last»:

The Federal Election Commission requires that we have the Employer and Occupation of every person who contributes to our 1996 U.S. Senate campaign. This applies to each person who signs the check donated to our campaign.

We do not have on file your Employer/Occupation. Please complete the enclosed card and return it in the enclosed envelope as soon as possible so that we will be in compliance with all Federal regulations.

Thank you again for your support of our 1996 Senate race. We will do our best to see your interests addressed in Washington.

Sincerely,

Brenda Turner  
Campaign Manager  
Mike Huckabee for U.S. Senate

Enclosures

99-04-294-4242

## **DOCUMENT NO. 9**

*Mike*  
**HUCKABEE**  
Lieutenant Governor

P.O. Box 1557 • Texarkana, AR 75504-1557 • (501) 772-5344 • FAX (501) 773-0439

Dear Faithful Friend,

Finally! We've completed a long and extended legislative session at the State Capitol. I am reminded again that politics is a process – not an event – and we have to be grateful for victories, but undeterred by defeats.

Let me tell you why I haven't been able to communicate with you by letter since right after the election. By law, all efforts which could be considered fund raising had to cease as of December 9, 1994 – the required 30 days before the 1995 Legislative Session began. Not long before that, we had sent a letter asking your help in paying off the final expenses of our record setting campaign. (The victory in November marked the largest margin of victory for a Republican candidate statewide in this century!)

We had to send back any checks we received dated after December 9th, which represented a very significant amount of money – virtually enough to have met all the expenses! It was painful having to send money back when it was genuinely needed, but that was the law.

Now that the legislature has adjourned and the required 30 days after the session has been met, we must take urgent steps to pay all debts from the 1994 campaign.

You have helped me time and again, and your efforts have been successful. As much as I wish it were possible for me to personally absorb the expenses of the campaign, I simply cannot. My oldest son hopes to start college this fall, and the expense of maintaining residences in both Little Rock and Texarkana these past two years has been very difficult. Added to that has been our attempt to recover from the campaign costs of a nonstop three year period.

I have always believed that if I did my part as a candidate and elected official in putting up with the sometimes vicious editorial attacks, and if my family and I were willing to forego any privacy whatsoever to go into the battles of the political arena, then our friends would stand by us with their prayers, their support, and their contributions. I am confident that you will not let us down now. I hope you feel I've been faithful to the job you've given me, and

that you believe that I have done exactly what I said I would do if elected. I truly need you to send your contributions today so we can close the books once and for all on a winning campaign of 1994.

Your assistance with a check of \$100, \$50, \$25, \$15, or \$10, will mean much. **I hope you can send your gift right away, so we may pay all of the remaining expenses immediately.** We've held off as long as we can, and cannot ask others to be patient indefinitely for what is due them. They all understood, and have been willing to wait until the legislature went home. Now, I feel obligated to either quickly raise the funds to end the expenses, or find ways to cover them personally, which may mean drastic measures for my family. That's my last resort, as I feel my own children have paid a high price already with such a disruption in their world.

I do hope that I'll hear from you this week. Thanks for your help and your friendship!

Gratefully,

A handwritten signature in black ink that reads "Mike Huckabee". The signature is written in a cursive, flowing style.

Mike Huckabee

*P.S. Please take the time to answer the enclosed survey. I truly want to know your thoughts on these subjects!*



# ARKANSAS CITIZEN OPINION SURVEY

Over the past few months, a number of key issues have been before the people of Arkansas and through the legislature. The intense and long session of the 80th General Assembly is finally over, but in order to better understand how you feel about key issues, please take a minute to answer the following questions, and give me your thoughts and opinions.

1. There was much talk about the possibility of school consolidation, but many of us believe that such decisions should be left to those living in the local districts. What do you think? Do you...

1. Favor Consolidation? ☐ yes ☐ no ☐ not sure

comments \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. New highways might involve new taxes...Would you vote for more taxes if it went to highways?

☐ yes ☐ no ☐ not sure

comments \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3. A proposal has often been before the legislature which would repeal the sales tax on food. Do you favor the repeal of the sales tax on food, to be replaced by a 1/2 cent tax on non food items?

☐ yes ☐ no ☐ not sure

comments \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

4. Do you support an "informed consent law" which would require that a women be given adequate and honest medical information about an abortion before she has one?

☐ yes ☐ no ☐ not sure

5. Please give any suggestions for overhauling the welfare system: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

6. Do you favor the death penalty for those convicted of capital murder?  
☐ yes      ☐ no      ☐ not sure

7. Should DWI laws be stricter, such as automatic suspension of Driver's License upon DWI arrest?  
☐ yes      ☐ no      ☐ not sure

8. Do you support efforts to update the Arkansas Constitution, so long as safeguards are built into the process to insure that the voters have the final say, and that issues such as term limits, usury, unborn child amendment, etc., are not tampered with?  
☐ yes      ☐ no      ☐ not sure  
comments \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

9. There has been much speculation about the open U.S. Senate seat which will be vacated in 1996 by Senator David Pryor. Do you think I should consider running for that office? Would you be willing to support the campaign if I ran? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

10. Please list any major reforms/other issues you would like to see addressed by the State of Arkansas: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Please send checks and surveys to: P.O. Box 1557 • Texarkana, AR 75504-1557

NAME \_\_\_\_\_

ADDRESS \_\_\_\_\_  
\_\_\_\_\_

OCCUPATION \_\_\_\_\_ EMPLOYER \_\_\_\_\_

PHONE \_\_\_\_\_

Here's my contribution to clear expenses in the Victorious Campaign:

\_\_\_\_\_ \$100 \_\_\_\_\_ \$50 \_\_\_\_\_ \$25 \_\_\_\_\_ \$10 \_\_\_\_\_ (other)

0524" 163" 140" 66



100-100000-100000

## **DOCUMENT NO. 10**

# Mike HUCKABEE

U.S. Senate



Post Office Box 1557 • Texarkana, Arkansas 75504-1557 • Tel. (501) 772-5344 • Fax (501) 773-0439

«MAILNAME»

«ADDRESS1»

«CITY» «STATE» «ZIP»

Dear «SALUTATION»:

Thank you so much for your recent contribution of \$«CPTOT» to my upcoming race for the U.S. Senate. I am extremely grateful for your generosity and support this early in the year. Your contribution will be posted to the primary period for the 1996 election cycle.

I want to be your next Senator, and I'm humbled by your very valuable help. This will be a very intense and hard-fought campaign, but I pledge to apply my convictions and my commitment to the prosperity of our state and its people.

Federal election laws require that we have occupation and employer information on file for each contributor for our reports. Please take the time to fill out that portion of the enclosed card and return it to us, if you have not already done so. We appreciate your help in complying with these requirements.

Thank you again for your support.

With sincere gratitude,

Mike Huckabee  
Lt. Governor of Arkansas

Enclosure



State of Arkansas  
Sharon Priest  
SECRETARY OF STATE

Ethics Division  
Little Rock, Arkansas 72201-1094

REPORTS OF CONTRIBUTIONS AND EXPENDITURES

NAME OF CANDIDATE <u>MIKE HUCKABEE</u>	
ADDRESS (STREET, P.O. BOX OR RURAL ROUTE) <u>P.O. Box 1557</u>	
CITY <u>TEXARKANA</u>	STATE <u>AR</u> ZIP <u>75504</u>
TITLE OF OFFICE SOUGHT TO WHICH THIS REPORT IS APPLICABLE <u>LT. GOVERNOR</u>	
TYPE OF ELECTION (CHECK ONE OF THE FOLLOWING) <input type="checkbox"/> Preferential Primary Election <input type="checkbox"/> General Primary Election (Run-Off) <input checked="" type="checkbox"/> General Election <input type="checkbox"/> Special Election	
Date of Election <u>11-8-94</u>	
TYPE OF REPORT (CHECK ONE OF THE FOLLOWING) <input type="checkbox"/> First Monthly Report <input checked="" type="checkbox"/> Monthly Report <input type="checkbox"/> 10 Day Preelection Report (Due 7 days prior to any election) <input checked="" type="checkbox"/> Final Monthly Report <input type="checkbox"/> April 15 Quarterly Supplemental Report For period of January 1 to March 31 <input type="checkbox"/> July 15 Quarterly Supplemental Report For period of April 1 to June 30 <input type="checkbox"/> October 15 Quarterly Supplemental Report For period of July 1 to September 30 <input type="checkbox"/> January 15 Quarterly Supplemental Report For period of October 1 to December 31	
Covering Period <u>9-1-95</u> through <u>9-30-95</u>	
Total Contribution Amount Carried Forward. . . . . \$ <u>1160.86</u>	
Total Contributions Received This Reporting Period. . . . . \$ <u>.00</u>	
Total Expenditures Made This Reporting Period. . . . . \$ <u>1160.86</u>	
Current Surplus or Debt of Campaign Funds at Close of Reporting Period. . . . . \$ <u>.00</u> (USE BRACKETS TO INDICATE DEBT)	
Disposal of Surplus Campaign Funds: (Check on Final Report Only) <input type="checkbox"/> Treasurer of State for benefit of General Revenue Fund Account of the State Apportionment Fund; <input type="checkbox"/> Contributors to the Candidate's Campaign <input checked="" type="checkbox"/> An organized Political Party <u>ck. for Balance Written To Republican Party of Arkansas</u>	
If you have not received any contributions or made any expenditures this reporting period, please check the No Activity Box. If you have checked the No Activity Box, you may complete this page only. There is no need to complete the following Campaign Contribution Report and the Campaign Expenditure Report pages 1 and 2. If you have not checked the No Activity Box, please continue. <b>NO ACTIVITY</b> <input type="checkbox"/>	
The law provides for a maximum penalty of \$1,000 and/or imprisonment for not more than one year for any person who knowingly or willfully fails to comply with the provisions of this Act. (Arkansas Code of 1987 Annotated §§ 7-6-201 — 7-6-219) - THIS REPORT CONSTITUTES A PUBLIC RECORD -	
PRIMARY ELECTION: Any election held by a political party in the manner provided by law for the purpose of selecting nominee of said political party for certification as candidates for election at any general or special election in this state GENERAL OR SPECIAL ELECTION: The regular biennial or annual elections for election of United States, state, district, county, township, and municipal officials and the special elections to fill vacancies therein.	
- Affidavit -	
STATE OF ARKANSAS COUNTY OF <u>Miller</u> I, <u>Brenda Turner</u> , being duly sworn, depose (affirm) and state that I have read the attached report; and, to the best of my knowledge and belief, the information disclosed therein is a complete and accurate financial statement of the candidate's or committee's campaign contributions and/or expenditures for the election so indicated above.	
Sworn to and subscribed before me, a Notary Public, in and for <u>Miller</u> County, Arkansas, on this <u>15th</u> day of <u>October</u> , 19 <u>95</u> .	
<div style="display: flex; justify-content: space-between;"><div><div style="border: 1px solid black; padding: 5px; text-align: center;">OFFICIAL SEAL BILL C. POYNTER NOTARY PUBLIC - ARKANSAS My Commission Expires <u>12-31-96</u></div></div><div><u>Brenda Turner</u> (Signature of Candidate or Candidate's Representative)</div></div> <div style="text-align: right;"><u>Bill C. Poynter</u> (Signature of Notary Public)</div>	

SECRETARY OF STATE

Ethics Division

Little Rock, Arkansas 72201-1094

## CAMPAIGN CONTRIBUTION REPORT

MIKE HUCKABEE

Name of Candidate

10-16-95

Date of This Report

Page 1 of 1

PLEASE TYPE OR PRINT		Do not list contributions previously reported Itemize contributions over \$100
1. Full Name, Mailing Address and ZIP Code of Contributor	Employer and Principal Place of Business	Amount of Each Contribution This Period
<i>none</i>	Occupation	
	Aggregate This Election > \$	
2. Full Name, Mailing Address and ZIP Code of Contributor	Employer and Principal Place of Business	Amount of Each Contribution This Period
	Occupation	
	Aggregate This Election > \$	
3. Full Name, Mailing Address and ZIP Code of Contributor	Employer and Principal Place of Business	Amount of Each Contribution This Period
	Occupation	
	Aggregate This Election > \$	
4. Full Name, Mailing Address and ZIP Code of Contributor	Employer and Principal Place of Business	Amount of Each Contribution This Period
	Occupation	
	Aggregate This Election > \$	
5. Full Name, Mailing Address and ZIP Code of Contributor	Employer and Principal Place of Business	Amount of Each Contribution This Period
	Occupation	
	Aggregate This Election > \$	
6. Full Name, Mailing Address and ZIP Code of Contributor	Employer and Principal Place of Business	Amount of Each Contribution This Period
	Occupation	
	Aggregate This Election > \$	
7. Full Name, Mailing Address and ZIP Code of Contributor	Employer and Principal Place of Business	Amount of Each Contribution This Period
	Occupation	
	Aggregate This Election > \$	

(Fill in total on last page of Contribution Report)

Total Contributions this Report (itemized and unitemized) . . . . . \$ \_\_\_\_\_

Form Approved by the Ethics Commission as required by law.

4524" 163" 40" 66

SECRETARY STATE

**Ethics Division**

Little Rock, Arkansas 72201-1094

## CAMPAGN EXPENDITURE REPORT PAGE 1

MIKE HUCKABEE

Name of Candidate

10-15-95

Date of This Report

### Itemized Expenditures Over \$100

[illegible]

MIKE HUCKABEE  
Name of Candidate

10-15-95  
Date of This Report

**PAID CAMPAIGN WORKERS**

NAME	AMOUNT PAID
Brenda Turner	502.19
Total Expenditures	1160.86